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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT RUNDO,
ROBERT BOMAN,
AARON EASON, and
TYLER LAUBE,

Defendants.

No. 18-759-CJC

STIPULATION REGARDING DEFENDANT
TYLER LAUBE'S APPLICATION FOR
REVIEW OF ORDER SETTING CONDITIONS
OF RELEASE/DETENTION UNDER 18
U.S.C. § 3142

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorneys David T. Ryan and George E. Pence, and defendant TYLER LAUBE ("defendant"), by and through his counsel of record, Jerome Haig, hereby stipulate as follows:

1. The Complaint in this case was filed on October 20, 2018, charging defendant with Conspiracy, in violation of 18 U.S.C. § 371, and Riots, in violation of 18 U.S.C. § 2101. On October 24, 2018,

1 defendant was arrested and made his initial appearance. At his
2 detention hearing, defendant sought release on a \$15,000 bond based
3 on an unsecured affidavit of surety from his mother. The government
4 requested detention, and the Court (The Honorable Maria A. Audero,
5 United States Magistrate Judge) ordered defendant detained pending
6 trial.

7 2. On November 1, 2018, an Indictment was filed charging
8 defendant with Conspiracy, in violation of 18 U.S.C. § 371. On
9 November 13, 2018, defendant signed a plea agreement in which he
10 agreed to plead guilty to Conspiracy. (Dkt. 59.) On November 20,
11 2018, defendant pled guilty pursuant to the plea agreement.

12 3. On November 19, 2018, defendant applied for reconsideration
13 of the detention order. On November 20, 2018, the Court (The
14 Honorable Maria A. Audero, United States Magistrate Judge) held a
15 hearing on defendant's application. At that hearing, defendant
16 sought release on \$175,000 bond based on unsecured affidavits of
17 surety from seven different sureties (\$25,000 each). In light of
18 defendant's presentation of seven sureties, the qualifications of and
19 representations made by those sureties, and defendant's early
20 acceptance of responsibility for his conduct in this case, the
21 government agreed that conditions of release could adequately
22 mitigate the risks of flight and danger to the community. The Court
23 denied defendant's application, finding that no condition or
24 combination of conditions reasonably would assure the appearance of
25 defendant at future proceedings. (Dkt. 68).

26 4. On November 21, 2018, defendant filed an application to
27 this Court for review of the detention order. The government
28 maintains its position set forth above. The parties continue to

1 agree that the proffered bond is sufficient to reasonably assure the
2 presence of defendant at future court proceedings and mitigate the
3 risk of danger to the community.

4 IT IS SO STIPULATED.

5 Dated: November 27, 2018

Respectfully submitted,

6 NICOLA T. HANNA
United States Attorney

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8 PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

9
10 /s/

11 DAVID T. RYAN
GEORGE E. PENCE
Assistant United States Attorneys

12
13 Attorneys for Plaintiff
UNITED STATES OF AMERICA

14
15 Dated: November 27, 2018

/s/ by email authorization

16 JEROME HAIG
Attorney for defendant
17 TYLER LAUBE
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